

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)
v.)
Plaintiff,) No. 3:23-cv-00243
) JUDGE CAMPBELL
SOUTHERN BAPTIST CONVENTION;) MAGISTRATE JUDGE
GUIDEPOST SOLUTIONS LLC; and) FRENSELY
EXECUTIVE COMMITTEE OF THE)
SOUTHERN BAPTIST CONVENTION,) JURY DEMAND
)
Defendants.)

**RESPONSE OF THE EXECUTIVE COMMITTEE OF THE SOUTHERN BAPTIST
CONVENTION TO THE COURT'S MARCH 31, 2025 ORDER (DOC. 315)**

On March 31, 2025, the Court entered an Order regarding the parties' motions for leave to file under seal certain exhibits in connection with their summary judgment filings. To facilitate the Court's review, it directed each party to file a list or chart with respect to the documents it sought to seal and providing specified information concerning each document. Below is chart submitted by the Executive Committee of the Southern Baptist Convention with respect to its motion for leave to file under seal (Doc. 225):

| <u>Document Description</u> | <u>Dkt No.</u> | <u>Redacted Version Filed</u> | <u>Party or Non-Party Designating as Confidential</u> |
|---|--------------------|-----------------------------------|---|
| I. Documents Containing Identifying Information of Doe | | | |
| Redaction of Jane Doe's name from the 30(b)(6) deposition | 226-1 | Yes (Doc. 222-4) | N/A |

Redaction of Jane Doe's name from the 30(b)(6) deposition 226-1 Yes (Doc. 222-4) N/A

transcript of Guidepost
Solutions: page 148, line 11.

Redaction of Jane Doe's name from the deposition transcript of Samantha Kilpatrick: page 96, line 1; page 96, line 13; page 97, line 6; page 97, line 11; page 97, line 20; page 303, line 2; and page 303; line 13.

226-2 Yes (Doc. 222-5) N/A

Redaction of Jane Doe's name from the deposition transcript of Bart Barber: page 104, line 16 and page 104, line 25.

226-3 Yes (Doc. 222-10) N/A

II. Documents Filed Under Seal for Other Reasons

Redaction from the deposition transcript of Samantha Kilpatrick 226-2 Yes (Doc. 222-5). The redacted portion is page 124, line 9. Guidepost This redaction has not been the subject of a prior order to seal.

Redaction of excerpts from 30(b)(6) deposition transcript of Johnny Hunt Ministries 226-4 Yes (Doc. 222-11). The redacted portions are page 31, lines 11 through 23 and page 33, lines 12 through 16. Plaintiff / Johnny Hunt Ministries This redaction has not been the subject of a prior order to seal.

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP

/s/ Scarlett Singleton Nokes
Scarlett Singleton Nokes (TN Bar # 028994)
Gene R. Besen (pro hac vice)

220 Ross Avenue, 20th Floor
Dallas, TX 75201
Tel: (469) 391-7411
snokes@sheppardmullin.com
gbesen@sheppardmullin.com

JACKSON KELLY PLLC

/s/ Thomas J. Hurney, Jr.

Thomas J. Hurney, Jr., (pro hac vice)
Gretchen M. Callas (pro hac vice)
500 Lee Street, E, Suite 1600
Charleston, WV 25301
Tel: (304) 340-1000
thurney@jacksonkelly.com
gcallas@jacksonkelly.com

*Counsel for Defendant Executive Committee of the
Southern Baptist Convention*

CERTIFICATE OF SERVICE

The undersigned certifies that a true and complete copy of the foregoing has been served through the Court's electronic filing system to the following on April 25, 2025:

Robert D. MacGill
Patrick J. Sanders
MacGill PC
156 E. Market Street, Suite 1200
Indianapolis, IN 46204
Robert.macgill@macgilllaw.com
Patrick.sanders@macgilllaw.com

Todd G. Cole
Andrew Goldstein
Cole Law Group, P.C.
1648 Westgate Circle, Suite 301
Brentwood, TN 37027
tcole@colelawgrouppc.com
agoldstein@colelawgrouppc.com
Counsel for Plaintiff

Melissa J. Hogan
Qawah Law
8757 Horton Highway
College Grove, TN 37046
melissahogan@qavahlaw.com
Counsel for Jane Doe

E. Todd Presnell
R. Brandon Bundren
Bradley Arant Boult Cummings LLP
1600 Division Street, Suite 700
Nashville, TN 37203
tpresnell@bradley.com
bbundren@bradley.com
*Counsel for the Executive Committee
of the Southern Baptist Convention*

John R. Jacobson
Katherine R. Klein
Riley & Jacobson, PLC
1906 West End Avenue
Nashville, TN 37203
jjacobson@rjfirms.com
kklein@rjfirms.com

Steven G. Mintz
Terence W. McCormick
Scott Klein
Adam Kahan Brody
Alex Otchy
Mintz & Gold LLP
600 Third Avenue, 25th Floor
New York, NY 10016
mintz@mintzandgold.com
mccormick@mintzandgold.com
klein@mintzandgold.com
brody@mintzandgold.com
otchy@mintzandgold.com
*Counsel for Defendant Guidepost
Solutions, LLC*

Louis Gino Marchetti, Jr.
Taylor, Pigue, Marchetti & Blair, PLLC
2908 Poston Avenue
Nashville, TN 37203
gmarchetti@tpmlaw.com

Matthew C. Pietsch, Esq.
Gordon Rees Scully Mansukhani, LLP
4031 Aspen Grove Drive, suite 290
Franklin, TN 37067
mpietsch@grsm.com
Counsel for Southern Baptist Convention

/s/ Thomas J. Hurney, Jr.

Thomas J. Hurney, Jr.